This copy filed in FCC docket 06-49.

On Aug 25, 2011, Warren Havens, of Skybridge Spectrum Foundation and Telesaurus Holdings GB LLC (each M-LMS licensees), discussed by teleconference the topics set forth below with the FCC staff persons identified immediately below.

To some degee, this involved issues in docket 06-49. Thus, a copy of this is hereby filed in the docket.

/s/

Warren Havens

From: Paul Murray <Paul.Murray@fcc.gov>

To: Warren Havens <warren.havens@sbcglobal.net>

Cc: Nese Guendelsberger < Nese. Guendelsberger@fcc.gov >; jstobaugh@telesaurus.com; Paul D'Ari

<Paul.DAri@fcc.gov>

**Sent:** Thursday, August 25, 2011 8:58 AM **Subject:** RE: proposal for New M-LMS

Mr. Havens -- we'll call you today at 3 our time if that works for you.

From: Warren Havens [mailto:warren.havens@sbcglobal.net]

**Sent:** Thursday, August 25, 2011 11:40 AM

To: Paul Murray

**Cc:** Nese Guendelsberger; jstobaugh@telesaurus.com

Subject: Re: proposal for New M-LMS

I am checking back on this.

-WH

From: Warren Havens < warren.havens@sbcglobal.net>

To: Paul Murray <Paul.Murray@fcc.gov>

Cc: Nese Guendelsberger <Nese.Guendelsberger@fcc.gov>; "jstobaugh@telesaurus.com"

<jstobaugh@telesaurus.com>

**Sent:** Tuesday, August 23, 2011 12:24 PM **Subject:** Re: proposal for New M-LMS

Sure, I just sent you an email saying the same.

From: Paul Murray <Paul.Murray@fcc.gov>

To: Warren Havens <warren.havens@sbcglobal.net>

**Cc:** Nese Guendelsberger <Nese.Guendelsberger@fcc.gov>

**Sent:** Tuesday, August 23, 2011 12:07 PM **Subject:** RE: proposal for New M-LMS

Mr. Havens,

We may need to postpone as our building has been evacuated because of an earthquake felt in DC. We will find another time. Thanks for your understanding.

From: Warren Havens [mailto:warren.havens@sbcglobal.net]

**Sent:** Tuesday, August 23, 2011 12:22 PM

**To:** Paul Murray; Jim Schlichting; Nese Guendelsberger **Cc:** Julius Knapp; Paul D'Ari; jstobaugh@telesaurus.com

Subject: Re: proposal for New M-LMS

Mr. Murray, Yes thanks. I can call one of you if you provide a phone number. Or if you prefer, you can call me at 510 848 7797

From: Paul Murray <Paul.Murray@fcc.gov>

To: Warren Havens <warren.havens@sbcglobal.net>; Jim Schlichting <Jim.Schlichting@fcc.gov>; Nese

Guendelsberger < Nese. Guendelsberger@fcc.gov>

Cc: Julius Knapp <Julius.Knapp@fcc.gov>; Paul D'Ari <Paul.DAri@fcc.gov>; jstobaugh@telesaurus.com

**Sent:** Tuesday, August 23, 2011 8:26 AM **Subject:** RE: proposal for New M-LMS

Mr. Havens,

Nese and I would be happy to talk with you. Would it work if we called you at 3 pm today, eastern time?

**From:** Warren Havens [mailto:warren.havens@sbcqlobal.net]

**Sent:** Monday, August 22, 2011 4:16 PM

**To:** Jim Schlichting; Paul Murray; Nese Guendelsberger **Cc:** Julius Knapp; Paul D'Ari; jstobaugh@telesaurus.com

Subject: Re: proposal for New M-LMS

Jim Schlichting: jim.schlichting@fcc.gov
Paul Murray: paul.murray@fcc.gov

Nese Guendelsberger: nese.guendelsberger@fcc.gov

Could one of you please let me know who to discuss this with?

I sent the below to Mr. D'Ari, as you see, but the email auto returned with a message that he is out most of this week

Thanks.

Warren Havens

From: Warren Havens < warren.havens@sbcglobal.net>

To: "paul.dari@fcc.gov" <paul.dari@fcc.gov>

Cc: "julius.knapp@fcc.gov" <julius.knapp@fcc.gov>; "jstobaugh@telesaurus.com" <jstobaugh@telesaurus.com>

**Sent:** Monday, August 22, 2011 1:09 PM

Subject: proposal for New M-LMS

Wireless Telecommunications Bureau:

Paul D'Ari: <a href="mailto:paul.dari@fcc.gov">paul.dari@fcc.gov</a>

Office of Engineering and Technology: Julius Knapp: julius.knapp@fcc.gov

Mr. Dari,

After years of technical and market research, my companies have a proposal for rule changes in M-LMS, for a "New M-LMS"

The goal is to fulfill what the Commission set forth for M-LMS when creating it for upcoming advanced ITS (the FCC stated that, at the time).

This requires adjustments for current ITS market conditions and directions, and use of modern wireless architectures and technologies.

The proposed New LMS will:

- keep M-LMS for US Intelligent Transportation Systems (ITS),
- foster integration with DSRC,
- make that use viable and accelerate use, including by Vehicle to Vehicle (V2V) communication and location modes, involving ITS VANETs (vehicular ad hoc mesh nets, with built-in radiolocation resolving GPS errors [to achieve sub-foot level accuracy very reliably even in urban cores], and communications, etc.),
- support government ITS (defined major capacity at no cost to government under perpetual right, coordinated and supported by licensee: required for "substantial service" etc.),
- involve no change Part 15 vs M-LMS (and the V2V VANTET focus, and cognitive radio and network uses, will reduce interference to and from Part 15),
- use current technologies including cognitive radios and networks (power agile, power conservative, spectrum efficient, interference limiting, etc.),
- link to major CMRS, and with public safety wireless in emergencies,
- etc.

We have text and PPT documents to present this.

We have formerly shown the great need for ITS wireless and high accuracy location (HALO) in docket 06-49 including by studies from UC Berkeley ITS and wireless experts that we initiate and funded by charitable research grants (setting up objective independent research): \$160-320 billion annually in projected benefits to the US, if HALO is implemented, just considering core ITS safety and traffic efficiency gains (a multiple considering all HALO ITS and non-ITS uses nationwide).

Each component above can be demonstrated as feasible, efficient, supportive of strong ITS developments, etc. Core elements above including the the ITS VANETs were also by these UCB expert, with funding by my companies. US DOT RITA selected a paper with the core concepts (ITS VANETS with HALO and comms) as one of five selected out of scores submitted for advanced ITS.

I will call to discuss the procedure as to how to present this. I will try to reach you today or tomorrow.

- In docket 06-49?
- Or in a request for rulemaking? (and asking 06-49 to be terminated?)
- Or by other means?

We favor the proposed changes for all of M-LMS, but in the alternative may submit the proposal as rule waivers for our companies.

(After some interaction with you or other FCC staff on this, I will of course submit an ex parte presentation report in docket 06-49.)

Sincerely, Warren Havens

President

Skybridge Spectrum Foundation

Telesaurus Holdings GB LLC Berkeley California

www.scribd.com/warren\_havens/shelf